

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
) CRIMINAL ACTION
v.)
)
MATTHEW WRIGHT)

JOINT MEMORANDUM FOR STATUS CONFERENCE

The parties submit this Joint Memorandum For Status Conference pursuant to Local Rule 116.5(C). In addition to the issues addressed below, the parties hereby notify the Court that the defendant intends to request a pre-plea Presentence Report.

1. There are no outstanding discovery issues.
2. Neither party anticipates providing additional discovery.
3. The defendant does not intend to raise a defense of insanity or public authority.
4. The government has not requested notice of alibi.
5. At this time, the defendant does not anticipate filing any motions which would require a ruling by the District Court before trial.
6. There are no matters which require scheduling by the Court at this time.
7. The parties have discussed the possibility of an early resolution to the case. At this point, the parties have not reached a plea agreement, but discussions are ongoing.

8. The parties hereby agree to the Court's exclusion of the time between February 26, 2004 and June 1, 2004, which is reflected in the Court's February 26, 2004 Scheduling Order.
9. If required, the parties anticipate that a trial should take not more than four days.

Matthew Wright
Defendant

By: /s/ Eileen Donoghue by WHC
Eileen Donoghue, Esq.
Attorney for Defendant

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ William H. Connolly
William H. Connolly
Assistant U.S. Attorney